



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

US EPA RECORDS CENTER REGION 5



505685

DEC 29 1993

REPLY TO THE ATTENTION OF:

R-19J

Victor H. Sussman, Director  
Environmental Quality Office  
Ford Motor Company  
15201 Century Drive, Suite 608  
Dearborn, Michigan 48120

Dear Mr. Sussman:

I am writing in response to your letter dated October 25, 1993, and as a follow-up to my previous letter dated November 19, 1993, concerning the sediment remediation project on the River Raisin. Thank you for your patience in this matter. Members of my staff from Superfund, Regional Counsel, and Environmental Sciences have met and discussed the outstanding issues regarding this project and come to a resolution. The United States Environmental Protection Agency (U.S. EPA) has carefully evaluated the points raised in your letter of October 25, 1993, and determined that the most appropriate course of action is to deem the project a "non-time critical removal action" (NTCRA). I believe that this is the best solution and will result in not only an expedient initiation of river remediation, but will expectedly result in our moving forward in a protective, yet cost-effective manner.

Continuing under the time critical mode is no longer appropriate or necessary due to the time requirements for a project of this type, due to both its complexity and size. A NTCRA differs from a time critical removal action to the extent that the public is brought into the process through a 30-day public comment period. A document entitled the Engineering Evaluation/Cost Analysis (EE/CA) is completed for a NTCRA. The EE/CA develops and evaluates a limited number of removal alternatives. U.S. EPA provides the EE/CA and the recommended alternative to the public for comment and makes the final decision at the end of that period. On this project, the EE/CA process would run concurrently with our evaluation of Ford's submittal of a Toxic Substances Control Act permit application for the Allen Park Clay Mine Landfill.



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U.S. EPA foresees implementing the NTCRA on a schedule similar to that proposed in your October 25, 1993, letter, such that the action ultimately selected can be completed in the 1994 construction season. In addition, it is agreed that the sewer remediation should be combined with the sediment remediation under one Administrative Order by Consent (AOC). My staff are completing a redraft of the AOC incorporating the sewer remediation and will send it to you, with a schedule, in the near future. I look forward to our continued cooperative efforts in resolving the contamination problems at the Ford Outfall site. Pablo Valentin is the new project manager on this site, replacing Hank Ellison. If you have any further questions, please contact me or Mr. Valentin at (312) 353-5592.

Sincerely yours,

**/s/ original signed by**  
**Valdas V. Adamkus**

Valdas V. Adamkus  
Regional Administrator

bcc: ORA w/control slip  
Ken Westlake, R-19J  
William Sanders, S-14J  
Dale Bryson, W-15J  
William Munro, H-7J  
Pablo Valentin, HSRW-6J  
Jim Mayka, HSRW-6J  
Russ Hart, HSRW-6J  
Rick Karl, HSE-5J  
Ross Powers, Grosse Isle  
Tom Martin, CM-3T  
Debra Klassman, CM-3T  
Michael Smith, CM-3T  
Jodi Traub, HS-6J  
Bonnie Eleder, HSRW-6J  
John Connell, SPB-14J  
Scott Cooper, SPB-14J  
Steve Johnson, SPB-14J

cc: Alan Howard, MDNR  
Roger Jones, MDNR  
Robert Miller, MDNR  
Russell Harding, MDNR

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